

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Securus Technologies, Inc.)	WC Docket No. 09-144
Petition for Declaratory Ruling)	

**COMMENTS OF PAY TEL COMMUNICATIONS, INC.
IN SUPPORT OF APPLICATION FOR REVIEW (DA 13-1990)**

Pay Tel Communications, Inc. (“Pay Tel”), by its undersigned counsel and pursuant to 47 C.F.R. § 1.115, hereby files these Comments in Support of the Application for Review filed by Securus Technologies, Inc. on October 28, 2013 (“Application”). The Application seeks review by the Commission of the Declaratory Ruling and Order issued September 26, 2013 (“Order”), by the Wireline Competition Bureau under delegated authority.

Pay Tel has been an active participant in every significant inmate calling service proceeding before the Commission, including this proceeding, and its experience is a matter of record.¹

Pay Tel urges the Commission to review and set aside the Bureau’s Order for the following reasons:

¹ See Comments of Pay Tel Communications, Inc., WC Docket No. 09-144 (Aug. 31, 2009). Pay Tel is one of the Southeast’s leading inmate calling service providers, serving confinement facilities in North Carolina, Georgia, Virginia, South Carolina, Tennessee, Florida, Kansas, Missouri, Washington, Ohio, California, and New Mexico. Pay Tel was the first inmate calling services provider, beginning in 1991, to offer customer service and billing dedicated solely to serving inmates and their families and was the first inmate calling services provider, also beginning in 1991, to offer in-house billing and prepaid calling plans with account statements for customers. Pay Tel’s founder and president, Vincent Townsend, is a recognized expert on fraud prevention in public communications and served for many years as the payphone industry’s representative on the Telecommunications Fraud Prevention Committee of the Alliance for Telecommunications Industry Solutions.

1. The Order Undermines Confinement Facility Safety and Security

Securus' Petition is addressed to various "call diversion" schemes in the inmate calling services (ICS) environment. These schemes are premised on providing consumers geographically-based telephone numbers regardless of the consumer's physical location. The schemes are openly and purposefully marketed for the purpose of permitting consumers to lower inmate calling service bills by "tricking" ICS providers into believing that calls are being routed to local called parties when, in fact, the called party is located outside the inmate's correctional facility's local calling area.

Pay Tel has placed into the record in the parallel ICS rates proceeding (Docket No. 12-375) examples of accounts it was able to establish with five "alternative" ICS providers (including ConsCallHome) using the fictional name "Abraham Lincoln" and a fictional address of "1401 Pennsylvania Ave., Washington, D.C."² Each of these five "alternative" companies supplied Pay Tel with a local number corresponding to a regional jail facility in Lynchburg, Virginia. This was done even though the companies were provided an obviously fictional name and suspicious address and despite the fact that calls were to be forwarded to a North Carolina phone number, located nowhere near the Washington, D.C. address provided. Two of the alternative providers,³ on their own initiative, supplied Pay Tel with a falsified home address in Lynchburg, Virginia to give to the "traditional" ICS provider should the provider ask for a local address. One of the alternative providers even gave detailed instructions on how to respond to questions from

² See Pay Tel Ex Parte Presentation, Docket No. 12-375 (July 26, 2013) (relevant portions attached hereto as Exhibit A).

³ Neither of these providers was ConsCallHome.

the ICS provider regarding the new local phone number and provided a falsified Verizon billing statement corresponding to the new local number.

These alternative companies also market the ability to circumvent protections inherent in ICS such as call blocking. One company claims: “Our system allows you to receive the calls on any phone, cell phones, **blocked** phones, work phone, cable phone, internet phones and even satellite phones, anywhere in the world.”⁴ In fact, in light of the Bureau’s Order, ConsCallHome now actively markets to consumers that the numbers it provides cannot be blocked by ICS providers.⁵

The complicity of these companies in establishing false billing addresses and account information and circumventing established calling restrictions highlights the very real security problems associated with these services. As the Commission has previously recognized, the security requirements of confinement facilities make ICS a highly-specialized service. Inmate calls are monitored and restricted in order to protect the public as well as identifiable persons such as judges, jurors and victims’ families. Calls are also monitored and controlled to help prevent, deter and detect ongoing criminal activity conducted from a correctional facility. Call control activities are, therefore, a critical component of a facility’s law enforcement activities. In Pay Tel’s experience,

⁴ See Prison Calls Online, “Starter 3 Plan”, [prisoncallsonline.com](http://www.prisoncallsonline.com), <http://www.prisoncallsonline.com/starter.html> (last visited Nov. 12, 2013) (emphasis added). See also OCS Local, “Super 7 Plan”, [pcolocal.com](http://www.pcolocal.com), <http://www.pcolocal.com/super.html> (last visited Nov. 12, 2013).

⁵ See ConsCallHome, “Common Questions”, [conscallhome.com](http://www.conscallhome.com), http://www.conscallhome.com/commonQuestions/Can_ConsCallHome_numbers_be_blocked (last visited Nov. 12, 2013) (“Can ConsCallHome numbers be blocked? No. On September 26th of 2013, the FCC’s Wireline Competition Bureau denied WC Docket No. 09-144 filed by Securus, making it clear that prison phone providers cannot block ConsCallHome calls because of ‘security’ issues or because they feel that Millicorp and ConsCallHome is not able to provide secure phone lines under FCC regulations.”).

every confinement facility requires the installation of ICS equipment capable of monitoring and controlling inmate calling for the reasons described.

The call diversion schemes developed and promoted by ConsCallHome and others that are described and documented by Securus in its Petition undermine the ability of ICS providers to monitor and control inmate calling—which, in turn, undermines the efforts of law enforcement in these facilities. It is no exaggeration to say that call diversion schemes threaten public safety.⁶ For example, a common occurrence in this setting is that targeted call monitoring triggered by multiple calls to the same number within a defined period of time shows that the inmate is coordinating illegal activity with the called party. This could be theft, witness tampering, murder, or any number of crimes. If the called party is using a call diversion service such as ConsCallHome, there is no way to determine the accurate identity or location of the called party given that the identity and location of the called party may be masked (or even falsified) by the alternative provider, and the call may have even been forwarded to a third number. As a result, the facility would not know which law enforcement department to notify about the criminal activity or take other action to prevent its occurrence. If the called party is known only as Abraham Lincoln at 1401 Pennsylvania Avenue in Washington, DC, an obviously fictitious address, law enforcement cannot take meaningful action to prevent a crime that it knows is about to occur.

⁶ In its Comments, Pay Tel pointed to several real-world examples where its call control and monitoring capability were critical in either preventing or detecting ongoing criminal activity conducted from confinement facilities. *See* Comments of Pay Tel Communications, WC Docket No. 09-144, Exhibit A (Aug. 31, 2009) (Letter dated March 30, 2004 from Michael B. Talbert, Senior Special Agent, U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives; Letter dated January 26, 2004 from Sgt. Shawn Schwertfeger, Albemarle County Policy Department; and Letter dated March 31, 2004 from Officer Garlin W. Mills, Charlottesville Police Department).

To be clear, Pay Tel's concern with these schemes is not driven by the called party's desire to obtain lower call rates, but rather the called party's desire to operate outside the correctional facility's reach—thereby impeding the facility's sworn obligation to ensure public safety. In this regard, the call diversion schemes of ConsCallHome and similar entities are no different from three-way calling and other call forwarding devices which permit an inmate to place calls to the public unfettered by law enforcement monitoring and control capability.⁷

2. A Desire to Encourage Lower ICS Rates Should Not Trump Safety and Security Concerns

The Bureau states in the Order that “[t]his Order should not . . . be interpreted to prevent ICS providers from blocking due to legitimate security concerns.”⁸ The Order, however, does exactly that—it prevents, by its very terms, ICS providers from blocking calls to parties whose identity and location cannot be verified. This is, by definition, a legitimate reason for blocking calls. Confinement facilities depend on ICS providers to help ensure that calling service is only provided to identifiable parties, yet the effect of the Order is to encourage and promote business activities which are intended and designed to mask the identity and location of called parties.

To the extent the driving impetus for the Bureau's Order was a concern with ICS rates, that concern should be addressed in the context of the parallel ICS proceeding in

⁷ These concerns are well-documented by the law enforcement community and other relevant standards-setting bodies in the record. *See, e.g.*, Ex Parte Presentation of the Alliance for Telecommunications Industry Solutions (“ATIS”) Telecommunications Fraud Prevention Committee, CC Docket No. 96-128 (Aug. 24, 2007) (articulating safety and security concerns with a called party's use of a telephone number that is not associated with the geographic area in which he or she resides).

⁸ *See* Order at n.34.

Docket No. 12-375 and not in the context of this proceeding, which is concerned with safety and security.⁹

3. The Order Undermines Well-Settled FCC Authority Permitting ICS Providers to Tailor ICS to Address Legitimate Security Concerns

The Commission has long-recognized the special circumstances of ICS. Acknowledging these special circumstances, the Commission has previously recognized in its *TOCSIA Order*¹⁰ and *Billed Party Preference Order*¹¹ that inmates are not entitled to the same telecommunications environment to which the public is entitled and that exemption from the prohibition on call blocking that would otherwise apply is warranted in the ICS setting. Here, the Order's hair-splitting analysis of these authorities would undermine the basis upon which ICS has operated—particularly, the notion that the inmate environment is fundamentally different from the public environment and that safety concerns inherent in ICS must trump otherwise compelling interests in telecommunications policy. For example, the Bureau chastises Securus for failing to

⁹ It bears noting that, in other settings, the Commission has been careful to discourage, not encourage, rate arbitrage activity. *See, e.g., In re Connect America Fund, A National Broadband Plan for Our Future et al., Report and Order and Further Notice of Proposed Rulemaking*, 26 FCC Rcd 17663, 17669, 17676, 17891 (Nov. 18, 2011) (adopting rules designed to reform universal service and intercarrier compensation systems in order to “curtail wasteful arbitrage practices, which cost carriers and ultimately consumers hundreds of millions of dollars annually” and “reduce arbitrage and competitive distortions by phasing down byzantine per-minute and geography-based charges”); *In re Universal Service Contribution Methodology; Federal-State Joint Board on Universal Service et al., Report and Order and Notice of Proposed Rulemaking*, 21 FCC Rcd 7518, 7541 (June 27, 2006) (adopting interim modifications to the system for assessing contributions to the universal service fund to establish USF contribution obligations for interconnected VoIP service providers in order to prevent “contribution obligations [from] shap[ing] decisions regarding the technology that interconnected VoIP providers use to offer voice services to customers or to create opportunities for regulatory arbitrage”).

¹⁰ *Policies and Rules Concerning Operator Service Providers*, CC Docket No. 90-313, report and Order, 6 FCC Rcd 2744 (1991) (“*TOCSIA Order*”).

¹¹ *Billed Party Preference for IntraLATA 0+ Calls*, CC Docket No. 92-77, second Report and Order, 13 FCC Rcd 6122 (1998) (“*Billed Party Preference Order*”).

“identify[] [any] Commission precedent that would authorize the blocking of calls from inmates to persons who subscribe to call routing services”,¹² yet the Bureau itself takes pains to state that the “Order should not . . . be interpreted to prevent ICS providers from blocking due to legitimate security concerns.”¹³ The Bureau can’t have it both ways. The fact remains that both the *TOCSIA Order* and the *Billed Party Preference Order* are premised on an acknowledgement that ICS is different and that “neither TOCSIA nor [FCC] rules require telephones for use only by prison inmates to be unblocked.”¹⁴ The ability of ICS providers to control inmate calling by blocking calls where necessary has always been fundamental to the provision of the service and long-acknowledged by the Commission as necessary to ensure the safety and security of inmate calling. The Order’s 180-degree reversal of these concepts cannot be sustained.

Conclusion

For the reasons set forth above, the Commission should grant Securus’ Application for Review and set aside the Order.

¹² Order at ¶ 15.

¹³ *See id.* at n.34.

¹⁴ *See Billed Party Preference Order* at ¶56 (citing OSP Reform Notice).

Dated: November 12, 2013

Respectfully submitted,

PAY TEL COMMUNICATIONS, INC.

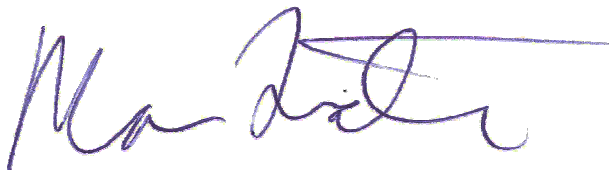


By:

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CERTIFICATE OF SERVICE

I, Marcus Trathen, hereby certify that the foregoing Comments of Pay Tel Communications, Inc. were served this 12th day of November, 2013 on the following persons identified below via electronic mail.

A handwritten signature in blue ink, appearing to read "Ma Trathen", is positioned above a horizontal line.

Stephanie A. Joyce, Esq.
Arent Fox LLP
Counsel for Securus
Stephanie.Joyce@arentfox.com

EXHIBIT A

TO

COMMENTS OF

PAY TEL COMMUNICATIONS, INC.

WC DOCKET NO. 09-144

July 26, 2013

By Electronic Filing

Notice of Ex Parte Presentation

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 12-375, Rates for Interstate Inmate Calling Services

Dear Ms. Dortch:

On July 25, 2013, Vincent Townsend, President of Pay Tel Communications, Inc. ("Pay Tel"), Don Wood of Wood and Wood Associates, and Marcus Trathen of Brooks, Pierce, McLendon, Humphrey & Leonard, LLP met with Pamela Arluk, Douglas Galbi, Gregory Haledjian, and Eric Ralph of the Wireline Competition Bureau. In this meeting, Pay Tel discussed its Inmate Calling Services Cost Presentation (the "Cost Study") filed in this proceeding on July 23, 2013, as well as issues generally related to inmate calling services ("ICS") cost development.

Pay Tel's consultant, Don Wood, presented the results of Pay Tel's ICS Cost Study, a summary of which is attached hereto.¹ The summary shows that Pay Tel's cost for collect/prepaid collect calls² is \$0.33/call when including the cost of commission payments and \$0.21/call when excluding the cost of commission payments. Mr. Wood explained that this cost was developed using methodologies that the Commission has historically and consistently relied upon and was based on Pay Tel's documented costs from audited financial statements for the base year 2012 and forward-looking costs for 2013-2015 for all Pay Tel facilities and across all Pay Tel calling types. Mr. Wood explained that this cost represents the minimum amount that Pay Tel must recover per minute for all call types (i.e., local and long distance) in order to cover its costs of providing ICS.

Mr. Wood also noted that the Cost Study presented the additional costs associated with (1) deployment of Continuous Voice Biometric Identification technology, which helps ensure facility safety by using biometric techniques to identify parties to a conversation and is currently deployed in a number of Pay Tel facilities; (2) video relay service for the hearing impaired, a technology discussed at

¹ The remaining portions of Pay Tel's Cost Study were filed under confidential seal with the FCC; Pay Tel requested confidential treatment thereof pursuant to Sections 0.457 and 0.459 of the Commission's rules. *See* Pay Tel's Request for Confidential Treatment, WC Docket No. 12-375 (July 24, 2013).

² "Prepaid collect" refers to billing relationships established by Pay Tel directly with the called party. This currently accounts for approximately 67% of Pay Tel's billed calls.

the FCC's recent ICS workshop; and (3) the processing of payments for ICS services. Mr. Wood described how the costs for each of these services were developed and documented in the Pay Tel Cost Study.

Pay Tel noted that its ICS development reflects the particular costs associated with the provision of services to jails as opposed to prisons, namely: the high turnover experienced in jails resulting in the establishment of a greater proportion of direct billing and prepaid account relationships per population than in prisons (a significant driver of ICS costs); the high number of free calls required in jail settings as opposed to prisons; the requirement imposed by jails to integrate ICS with commissary systems; the greater use of lower-cost debit accounts for ICS calls from prisons as opposed to higher-cost prepaid accounts for ICS calls from jails; and the much greater base of calling minutes over which costs may be spread in the prison setting. Consistent with its positions of record in this proceeding, Pay Tel urged the adoption of a tiered rate approach distinguishing between jails and prisons should the Commission move forward with the adoption of new rate restrictions in this proceeding.

Pay Tel also discussed its view that elimination of ICS providers' payments to facilities, as reflected in the Commission's prior treatment of commission costs, could leave facility administrators without the funds to cover the legitimate costs required to operate phones in a safe and secure manner, thereby risking cessation or diminution of ICS availability. Pay Tel advocated its view that if the Commission decides to set rates that do not include the cost of commissions, the Commission should adopt a cost recovery mechanism for facilities as a component of any ICS reform.

Pay Tel also discussed its view that the Commission should address the growing problem of add-on fees that drive up the cost of ICS to consumers. In support of this position, Mr. Townsend discussed Pay Tel's recent experiences with the RFP Process for a contract for the Albemarle-Charlottesville Regional Jail—a facility where Pay Tel had been the service provider for sixteen years. After all Proposals were submitted the consultant retained by the jail (Praeses) requested that all vendors, as a condition of consideration to continue in the evaluation process submit a new offer including the following impacts on Pay Tel: (1) increase the payment processing fee to \$5.95 (double the current fee charged by Pay Tel), (2) charge a new fee of \$3.00 for refunds, (3) raise the current calling rates, and (4) increase its commission offer to the facility. Pay Tel declined to double its payment fee and charge for refunds, but did increase its commission offer; ultimately, the contract was awarded to a competitor (ICSolutions) that agreed to impose the requested consumer fees and provide the jail a 78.1% commission with \$24,000/month in guaranteed payments.

Mr. Townsend also discussed Pay Tel's recent experience with the Roanoke City Jail RFP process another facility where Pay Tel had been the service provider for eight years. In connection with a re-bid of that contract, the contract was awarded to a competitor (Securus) that proposed a 78.3% commission payment to the jail (with the final rate agreed upon in the contract at 68.8%). Included in this bid was Securus's PayNowTM program, which provides single call rates at \$14.99/call; Securus agreed to pay \$1.60 (10.7%) of each such payment to the jail. Securus also offered its Text2ConnectTM program which charges \$9.99 per single call billed to a cell phone through a premium text message. Securus agreed to pay \$.30 (3%) of each such payment to the jail.

Finally, Mr. Townsend reiterated Pay Tel's position in the record regarding the potential for massive rate arbitrage—and the attendant fraud and security concerns associated therewith—should the Commission address only one aspect of ICS rates. Mr. Townsend discussed his recent experiences in establishing "local number" accounts with five different alternative ICS providers—ConsCallHome, Prison Calls Online, Jail Call Services, Prison Call Solutions, and Inmate Direct. Mr. Townsend

established accounts with each company using a falsified name, “Abraham Lincoln,” with a fictional address of Pennsylvania Avenue in Washington, D.C., and he was able to secure numbers local to the Blue Ridge Regional Jail in Lynchburg, Virginia. Two of the alternative providers, on their own initiative, supplied Pay Tel with a falsified home address in Lynchburg, Virginia to give to the ICS provider when it prompted Mr. Townsend for an address. One of the alternative providers even gave detailed instructions on how to respond to questions from the ICS provider (Securus) about the identity of the account holder and provided a falsified Verizon billing statement corresponding to the new local number. The complicity of these companies in establishing false billing addresses and account information highlights the very real security problems associated with rate arbitrage, which Pay Tel has discussed in its various filings in this proceeding. As shown in the attached depiction (“Potential Impact of Interstate Rate Cap on Arbitrage”³), if the Commission were only to adopt the Petitioners’ proposal there would be 97% increase in the number of called parties with a rate arbitrage incentive which, given the availability of companies that are ready and willing support the establishment of fictional and anonymous accounts, would cause massive disruption in ICS in jails.

Attached are copies of non-confidential written materials referenced during the meeting.

In accordance with Section 1.1206 of the Commission’s rules, this letter is submitted for inclusion in the record of the above-captioned proceeding. Please do not hesitate to contact the undersigned should any questions arise concerning this letter or the issues discussed herein.

Sincerely yours,

/s/ Marcus W. Trathen
Marcus W. Trathen

cc: Pamela Arluk (via email)
Doug Galbi (via email)
Gregory Haledjian (via email)
Eric Ralph (via email)
Deena Shetler (via email)
Kalpak Gude (via email)
Randolph Clarke (via email)
Lynne Engledow (via email)
David Zesiger (via email)
Rhonda Lien (via email)
Rebekah Goodheart (via email)

³ Previously submitted by Pay Tel in an *ex parte* presentation dated July 3, 2013.

SECURITY RISKS WITH ALTERNATIVE ICS PROVIDERS – THE REALITY WITH RATE ARBITRAGE TODAY

On Monday, July 8, accounts were established with five different alternative ICS providers and one month of service was purchased from each provider.

- Cons Call Home (www.conscallhome.com)
- Prison Calls Online (www.prisoncallsonline.com)
- Jail Call Services (www.jailcallservices.com)
- Prison Call Solutions (www.prisoncallsolutions.com)
- Inmate Direct (www.inmatedirect.com)

A fake name and address were used in conjunction with a real phone number and email address, and a number local to the Blue Ridge Regional Jail in Lynchburg, VA was requested.

Account Information

Name: Abraham Lincoln

Address: 1401 Pennsylvania Ave. NW, Washington, DC 20004

Phone Number: 336-337-7038

Email Address: RMouth1951@gmail.com

Facility Information


Facility Name: Blue Ridge Regional Jail

Facility Address: 510 9th Street, Lynchburg, VA 24504

Facility Phone Number: 434-847-3100

Example application from Prison Calls Online:

[Home](#) [How it Works](#) [FAQ](#) [Web Links](#) [Inmate News](#) [Contact Us](#) [Member Login](#)



1-888-813-0000
BUSTING THE SHACKLES OF HIGH
INMATE CALLING PRICES!

Call Toll Free
SMASH

Application

First Name	Abraham
Last Name	Lincoln
Address	1401 Pennsylvania Ave. NW
City	Washington
State/Province	DC
Zip	20004
Phone	3363377038
Email	RMouth1951@gmail.com
Facility Name:	Blue Ridge Regional Jail
Facility City, ST:	0 9th St., Lynchburg, VA
Facility Phone:	4348473100
Lead Source	Web Search Engine
Agent:	OCS

Got Questions?
For Prison Information and Family Support, Community check out **PrisonTalk.com**
PRISONTALK
PRISON INFORMATION AND FAMILY SUPPORT COMMUNITY

Office DEPOT
Save up to 80% on all your office needs!
Click Here

OCSLocal.com is owned and operated by OCS Communications a fully FCC registered phone company [FRN 0015151111]
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These alternative ICS providers promise to not share their customers' information, which means law enforcement may not have access to vital data for investigations.

"Don't worry, we take your privacy VERY seriously and will not share this information with anyone under any circumstances."

- ***Cons Call Home website: "Setting up your account"***

These alternative ICS providers are also allowing calls to go through to individuals whose original phone numbers have been blocked from receiving calls from a facility.

"Our system allows you receive the calls on any phone, cell phones, blocked phones, work phone, cable phone, internet phones and even satellite phones, anywhere in the world."

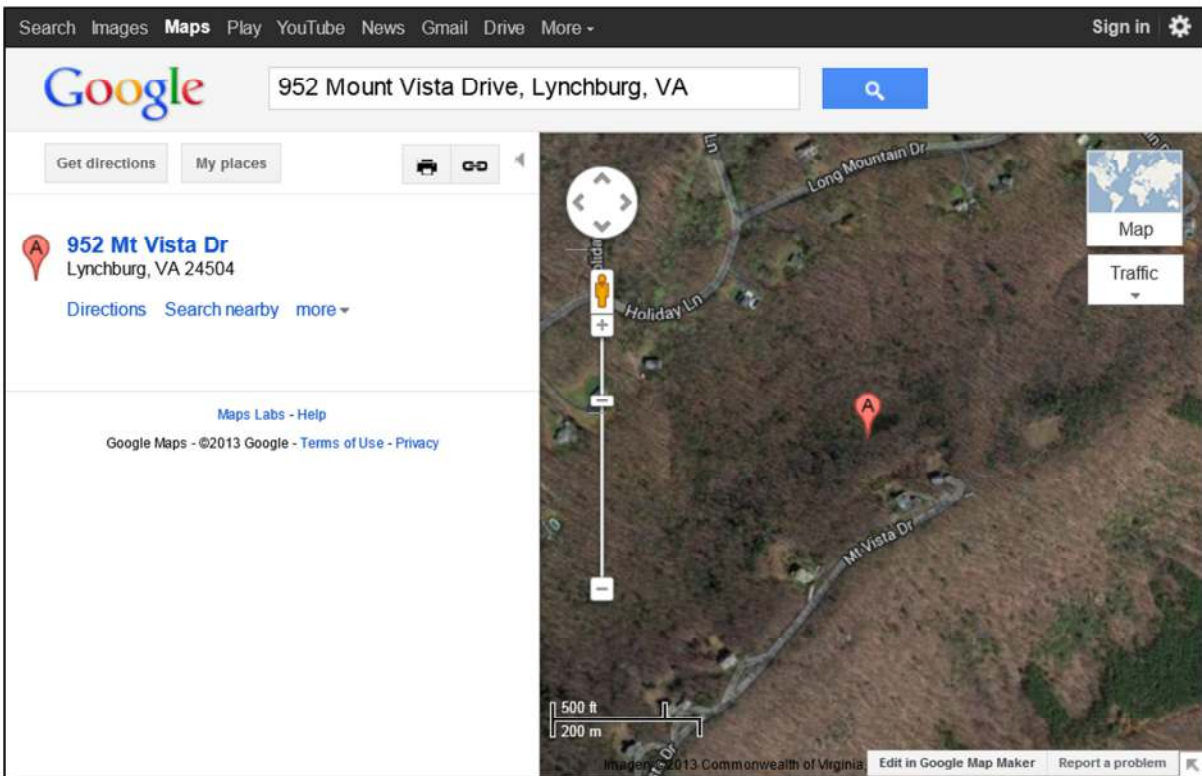
- ***Prison Calls Online website: "Starter 3 Plan"***

Two of the alternative ICS providers supplied a home address in Lynchburg, VA to provide to the ICS provider (Securus) when prompted for an address. Facility officers and investigators have access to Securus's customers' names and addresses, but in this case Securus will not have a real name, real phone number, or real address for the account. They will have a fake name (Abraham Lincoln), a local phone number which is not linked to a real person, and a false address – an ideal situation for criminals wishing to hide their identities while communicating with an inmate.

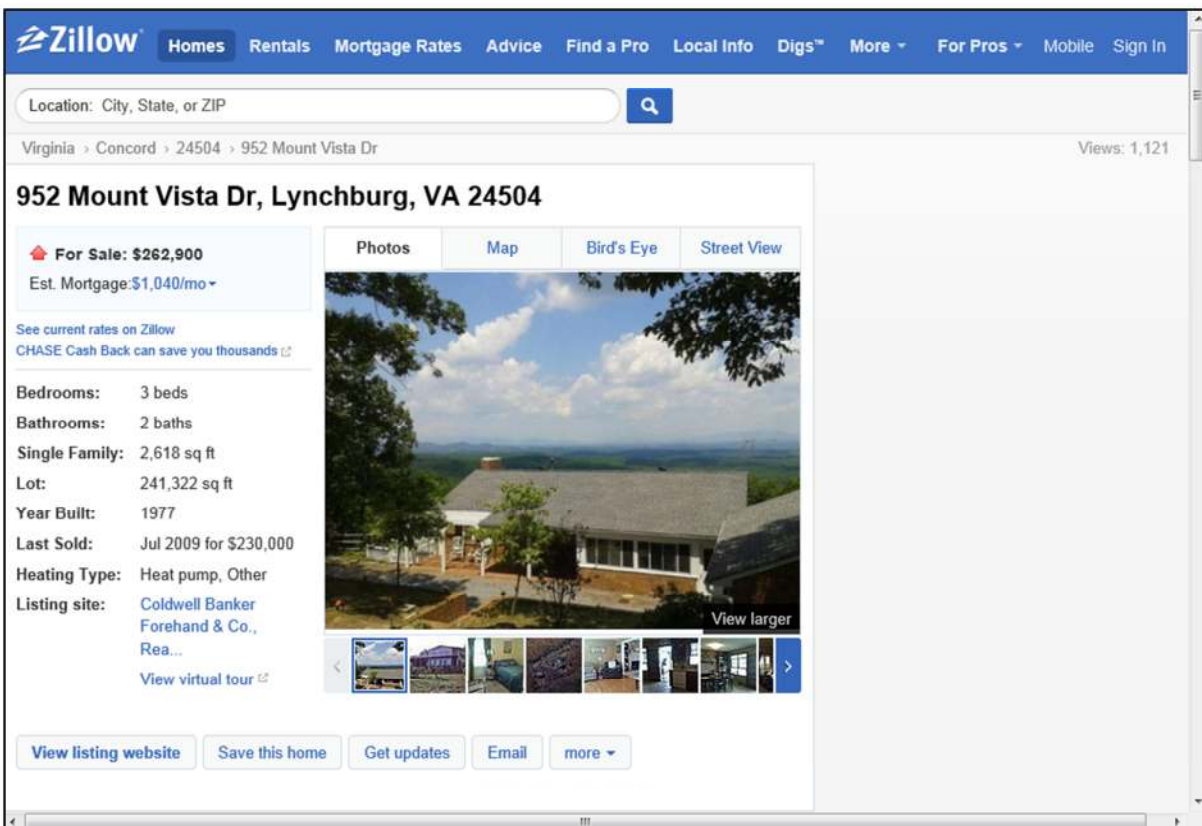
"If you are asked how you got this number, say, 'I got this phone number as my home phone from Verizon.'... If they ask you for an address with this number, give them 952 Mount Vista Drive, Lynchburg, VA... Would you like for me to transfer you to Securus to set up your prepaid account now?"

- ***Conversation with Prison Calls Online customer service representative***

Ironically both Prison Calls Online and Prison Call Solutions provided the same local phone number (434-515-2278). They also both provided the address at 952 Mount Vista Drive in Lynchburg to use as a home address for the account with Securus. When asked, Prison Call Solutions denied any relationship with Prison Calls Online.



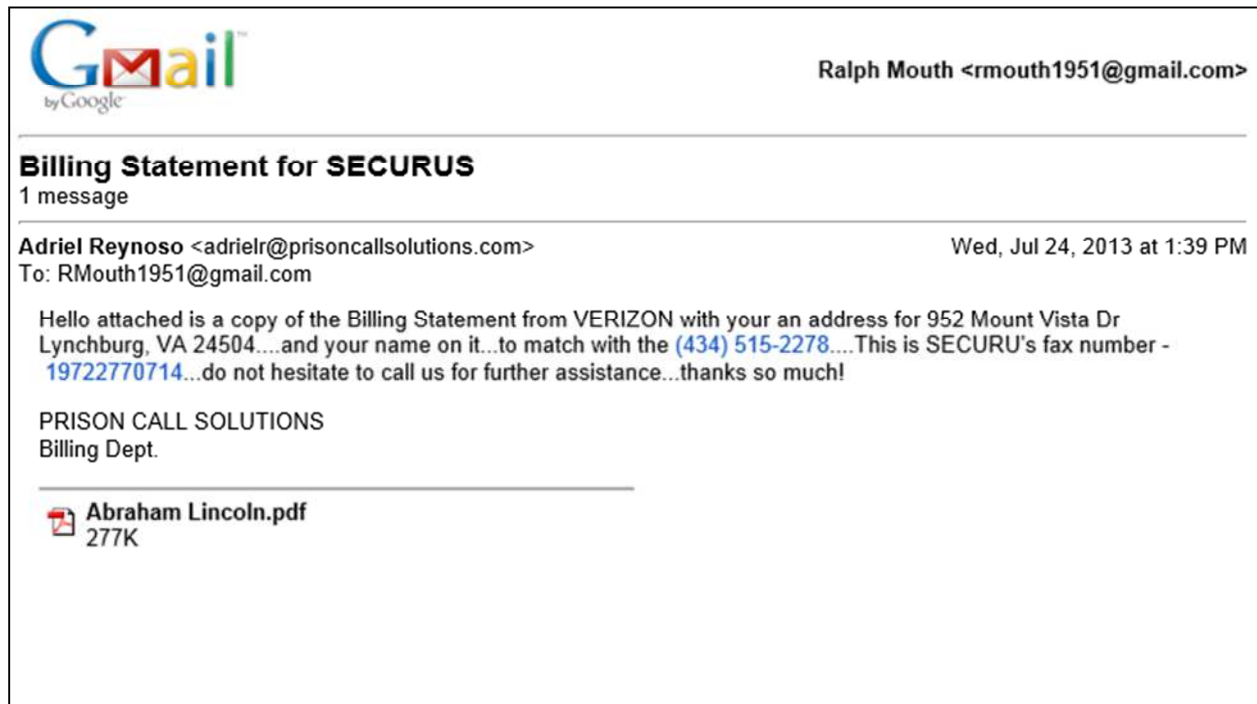
A Google search reveals that 952 Mount Vista Drive in Lynchburg, VA is a home that is currently for sale.



“If asked for a billing statement, let us know and we will send it to your email account.”

- ***Prison Call Solutions website: “Setting up your account”***

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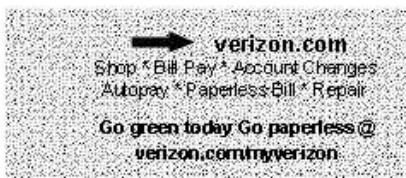
The bill statement attached to the email is for Abraham Lincoln at 952 Mount Vista Drive, Lynchburg, VA. Please see the following pages for the bill statement sent from Prison Call Solutions.



Account Number
10 5555 0674512962 04

Due Date
07/06/13

Amount Due
\$220.23



Account Information

Statement Date: 06/07/13
Abraham Lincoln
Phone: 434 515 2278

Account Summary

Previous Balance	\$220.26
Payment Received April 06	\$220.26
Balance Forward	\$0.00

New Charges

Current Activity	\$175.82
Specials and Promotions	\$10.00
Taxes, Fees and Other Charges	\$34.95
Total New Charges due by July 06, 2013	\$220.23

Amount Due by July 06, 2013 **\$220.23**

Verizon News

FiOS TV Online FREE
FiOS TV Online is an exclusive gateway to the best TV on the Internet. Sign in at verizon.com/fiosonline and watch the movies & shows you love from FiOS TV, right on your computer for FREE. If you subscribe to HBO or Cinemax you'll see their shows at FiOS TV Online too.

Package Deals/Great Savings
Call 1 800 584 1136 or click verizon.com/supreme & find out if FiOS is available in your area. Verizon provides a wealth of entertainment options all at a great value. Call or click today & learn more about all the new value bundles avail. for TV, Internet & phone.

Get More, Save More
Call 1 877 235 8107 to ensure you're getting the best Verizon services at the best value from phone, Internet and TV, to money saving bundles, international plans, and fun add ons. Together we'll find ways to save you even more.

Want Automatic Payment?

Enroll below or at Verizon.com to authorize your financial institution to deduct the amount of your monthly bill from the account associated with your enclosed check and send payment directly to Verizon. To discontinue Automatic Payment, call Verizon. Please keep a copy of this authorization.

Questions about your bill or service?

View your bills in detail at verizon.com or call 1 800 VERIZON (1 800 837 4966).
Enter your ten digit number 434 515 2278. Use 152278 if asked for the last six digits of your account number.
Use Quick Codes! Enter **4PAY** (4729) to pay bill, Enter **4BAL** (4225) for balance.
Customers with disabilities can reach us by TTY at 1 800 974 6006.

Please return remit slip with payment.

To enroll in Automatic Payment (Sign and date below)



By signing above, I hereby declare that I have reviewed and accepted the terms and conditions at verizon.com/enrtpayments for automatic bill payment.

Account Number: 10 5555 0674512962 04
New Charges Due: July 06, 2013
Amount Due: \$220.23 **149511**

Make check payable to Verizon

\$

Abraham Lincoln
952 Mount Vista Dr
Lynchburg, VA 24504



VERIZON SOUTHWEST
PO BOX 167
Hamilton, IN 46060



10 5555 0674512962 04N00000000000 00000021623 04

Phone Number
434 515 2278

Account Number
10 5555 0674512962 04

Date Due
07/06/13

Page
2 of 3

Current Activity

Current Charges

06/7 07/2	Triple Play	89.99
	· Verizon Freedom Essentials	30.00
	· FiOS TV Prime HD	50.00
	· FiOS Internet 15/5	29.99
	· 24 Mo. Bundle Credit thru July 22, 2013	15.00
	· Verizon Freedom Online LD Promo thru Jun 23, 2013	5.00

06/7 07/2	Inside Wire Maintenance	6.99
06/7 07/2	Priority Call	5.00
06/7 07/2	Select Call Forwarding	5.25
06/7 07/2	HBO/Cinemax	24.99
06/7 07/2	Standard STB Rental 2 @ 5.99	11.98
06/7 07/2	STB Rental	9.99
06/7 07/2	Multi Room DVR High Definition	19.99

Current Charges Subtotal \$174.18

Change in Service and Partial Month

06/15 07/5	HBO/Cinemax	1.10
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Change in Service and Partial Month Subtotal \$1.10

Current Activity Total \$175.28

Specials and Promotions

06/7 07/2	Valued Customer \$10/24Mo. thru July 4, 2013	10.00
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Specials and Promotions Total \$10.00

Taxes, Fees and Other Charges

Taxes, Governmental Surcharges and Fees

Federal Excise Tax	.51
TX State and Local Sales Tax	15.95
9 1 1 Equalization Fee	.23

Payment by Check

When you pay by check, you authorize us either to use information from your check to make a one time electronic fund transfer from your account or to process this transaction as a check. If you wish to be excluded from the electronic fund transfer process, please call 1 888 500 5358.

Disputed Charges

All charges on this bill may be disputed without loss of local telephone service while resolution is pending.

Slamming & Cramming

If you think you have been slammed, (your long distance service switched without your permission) or crammed (charged for services that you did not authorize), please contact us. If we do not resolve your problem, you may write the Public Utility Commission of Texas, c/o Office of Consumer Protection, PO Box 13326, Austin, TX 78711 3326, email at (customer@puc.state.tx.us) or call 512 936 7120 (toll free in Texas 1 888 782 8477). TTY service available on 512 936 7136.

Bankruptcy Information

If you are or were subject to a bankruptcy proceeding, this statement may include amounts for pre bankruptcy service. Any such pre bankruptcy balances are for your information only and you should not pay any pre bankruptcy amounts. Please direct all correspondence concerning bankruptcy to 404 Brock Drive, Bloomington, IL 61701.

9 1 1 Fee .62

Verizon Surcharges and Other Charges and Credits

Cost of Service Surcharge	.06
Texas Universal Service	1.15
Federal Universal Service Fee	1.34
Municipal Right of Way Fee	1.54
Federal subscriber line charge	6.50
Video Franchise Fee	7.05

Total Taxes, Fees and Other Charges \$34.95

Correspondence

Go to verizon.com/contactus or mail to
PO Box 33078, St. Petersburg, FL 33733

Closed Captioning Questions and Concerns?

If you have a concern or complaint with closed captioning on a program, please call Verizon at 1 800 VERIZON. Written correspondence can be sent by fax to 1 888 806 7026, by email to videoclosedcaption@verizon.com, or by mail to Verizon, PO Box 33052, St. Petersburg, FL 33701 Attn: Cynthia Morales, Manager.

Late Payment Charges

To avoid a late payment charge of 5.0% or \$5.00, whichever is greater, full payment must be received before July 6, 2013.

Local Franchise Authority FiOS TV

Your FCC Community ID is: TX2469

Service Providers

Verizon Southwest provides regional, local calling and related features, other voice services, and FiOS TV service, unless otherwise indicated. Verizon Long Distance provides long distance calling and other services identified by "VLD" in the applicable billed line item. Verizon Online provides Internet service and FiOS TV equipment. FiOS is a registered mark of Verizon Trademark Services LLC.

Disconnection of Basic Local Telecommunications

Service

You must pay your regulated charges of \$44.25 to avoid disconnection of your basic telecommunications service.

Phone Number
434 515 2278

Account Number
10 5555 0674512962 04

Date Due
07/06/13

Page
3 of 3

Need to Know Information

Premium Package Rate Changes

Your Premium package rate has increased this month. If you would like to review your current packages and rates or have any questions, please log on to verizon.com/myverizon, or give us a call at 1.877.